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Jr.

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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

12 ASHLEY PARHAM, JANE DOE, and
13 JOHN DOE,

14 Plaintiffs,

15 vs.

16 SEAN COMBS a/k/a "P. Diddy," "Puff
Daddy," "Love," "Puffy" and "Diddy,"
17 KRISTINA KHORRAM, SHANE
PEARCE, RUBEN VALDEZ, JOHN
18 PELLETIER, ODELL BECKHAM JR.,
DREW DESBORDES a/k/a "Druski,"
19 JACQUELYN WRIGHT a/k/a "Jaguar
Wright", HELENA HARRIS-SCOTT,
20 MATIAS GONZALEZ, BRANDI
CUNNINGHAM, JANICE COMBS,
21 KEITH LUCKS a/k/a "Big Homie CC,"
and JOHN and JANE DOES 1-10,

22 Defendants.
23
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Case No. 3:24-cv-07191-RFL

**DECLARATION OF GRIGOR
VAHANYAN IN SUPPORT OF
MOTION OF ODELL BECKHAM
JR. FOR THE IMPOSITION OF
SANCTIONS AGAINST
PLAINTIFFS AND THEIR
COUNSEL PURSUANT TO FED. R.
CIV. P. 11; MEMORANDUM OF
POINTS AND AUTHORITIES**

Judge: Hon. Rita F. Lynn
Date: October 14, 2025
Time: 10:00 a.m.
Crtrm.: 15

Judge: Hon. Rita F. Lin

Trial Date: None Set

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DECLARATION OF GRIGOR VAHANYAN

I, Greg VAHANYAN, declare as follows:

1. I am the President of Red Limo Line, LLC (“Red Limo”), a car service in Los Angeles, CA. I have personal knowledge of the matters set forth herein. If called upon and sworn as a witness, I could and would competently testify to the matters set forth herein.

2. Since April 1, 2015, I have operated Red Limo, a private car service in Los Angeles, California. In addition to my duties as President, I regularly drive Red Limo customers.

3. Red Limo was hired by Odell Beckham, Jr. to provide him with car service from, among other times, March 20, 2018 through March 24, 2018 while he was in Los Angeles, California. I personally drove Mr. Beckham, and his guests, on those dates.

4. As is the regular course and practice of Red Limo and myself, I maintain on Apple Notes on my iPhone a running record of my hours working for a client. I update the Note each day with the hours that I am working and, if an additional driver was working, the hours that they report to me at the end of their shift. Attached hereto as Exhibit “A” is a true and correct copy of my record of hours for the above mentioned time period.

5. As set forth in Exhibit “A”, I started work for Mr. Beckham on March 22, 2018 at 9:30 a.m., and continued working with him until 6:00 p.m. when I dropped him off at his home on Solar Drive.

6. I returned to Solar Drive to drive Mr. Beckham on March 23, 2018 at 12:30 p.m. We left Solar Drive at approximately 2:30 p.m. in order to take him to a training session. I was working with Mr. Beckham until 4:30 a.m. the morning of March 24, 2018, when I dropped him off at his home on Solar Drive. Due to the late hour, I slept in a guest room at Mr. Beckham’s home, and then started driving him again at 9:30 a.m. that morning when I took him to Santa Monica Beach.

Decl of Vahanyan


Final Audit Report


2025-04-24


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By:	Andrew Jablon (ajablon@rpblaw.com)
Status:	Signed
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"Decl of Vahanyan" History


 Document created by Andrew Jablon (ajablon@rpblaw.com)
2025-04-24 - 8:58:12 PM GMT

 Document emailed to redlimoline@[REDACTED] for signature
2025-04-24 - 8:58:30 PM GMT

 Email viewed by redlimoline@[REDACTED]
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 Signer redlimoline@gmail.com entered name at signing as Grigor Vahanyan
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 Document e-signed by Grigor Vahanyan (redlimoline@[REDACTED])
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